

May 9, 1972

Mr. Gleason Romans
Gleason Romans Pipe Line Patrol Co.
P.O. Box 51283
Tulsa, Oklahoma 74151

Dear Mr. Romans:

In your letter of April 27, 1972, you inquired about the appropriateness of the use of airborne telemetry for interrogating a rectifier unit to determine that it is operative.

So long as any type inspection that the operator makes assures that a rectifier is operating satisfactorily as required by Sections 195.416 and 192.465, it is immaterial to this office as to how that objective is accomplished.

I trust this answers your question relative to this type of remote electronic inspection.

Sincerely,

Joseph C. Caldwell
Director

Office of Pipeline Safety

GLEASON ROMANS

April 27, 1972

Mr. Joseph C. Caldwell
Acting Director
Office of Pipe Line Safety
Department of Transportation
Office of the Secretary
Washington, D.C. 20590

Dear Sir:

We have devised an airborne Telemetering Receiver to be carried in a patrol plane that decodes telemetry from a transmitter located at a cathodic protection rectifier location, to indicate that is [sic] is or is not functioning and to read out the amperage to ground. We also have a lower cost model that will simply monitor whether or not D.C. current is, in fact, entering the anode bed but does not telemeter the amount of current being conducted.

The system is barely out of the development stage and no installations have yet been made. However, there is a lot of industry interest in the system as a means of meeting your requirements for inspection.

195.416 "External Corrosion Control", specifies that (c) each carrier shall at intervals not exceeding 2 months, inspect each of its cathodic protection rectifiers."

192.465 "External Corrosion Control Monitoring" (b) at intervals not exceeding 2 months, each cathodic protection rectifier or other impressed current power source must be inspected to insure it is operating.

To be able to inspect them by remote telemetry from the patrol airplane would result in much more frequent checks to determine they are still working and eliminate a lot of rather costly ground transportation of personnel to accomplish this compliance.

We have been asked on numerous occasions if a patrol pilots written report that he has, in fact, interrogated the Cathodic Protection Monitor transmitter as he has flown over on a certain date and time, and this report was properly filed, would this suffice as suitable evidence to DOT that they had complied with the inspection regulation. Such monitoring of the end results would of course be evidence all components were operative and I don't believe a visual inspection could do any more without an extensive

dismantling and testing of components with elaborate testing equipment which most folks in the industry feel was not your intent.

A reply at your earliest convenience would be appreciated.

Yours truly,

Gleason Romans

July 25, 1972

Mr. Gleason Romans
Gleason Romans Pipe Line Patrol Co.
P.O. Box 51283
Tulsa, Oklahoma 74151

Dear Mr. Romans:

In your letter of June 23, 1972, you called attention to the different wording used in Section 195.416 of our liquid pipeline regulations and Section 192.465 of our gas pipeline regulations.

Although there is some minor difference in wording, our intent in either case is that a company must inspect each of its cathodic protection rectifiers at intervals not to exceed two months to ensure that each rectifier is operating.

Your electronic telemetering system apparently exceeds our minimum requirements which should be of additional benefit to a company utilizing your system.

I trust this answers your question satisfactorily.

Sincerely,

Joseph C. Caldwell
Director

Office of Pipeline Safety

July 11, 1972

Mr. Gleason Romans
Gleason Romans Pipe Line Patrol Co.
P.O. Box 51283
Tulsa, Oklahoma 74151

Dear Mr. Romans:

This will acknowledge receipt of your letter dated June 23, 1972, regarding an interpretation of Section 195.416 and Section 192.465.

Your particular question is being reviewed by our Technical Division. You will be advised as soon as possible of the interpretation as it relates to your specific question.

Sincerely,

Cesar DeLeon
Operation & Compliance Officer
Office of Pipeline Safety